

## **Exhibit 19**

Email exchange ending October 29, 2021, 7:02 PM  
between Lucien Greaves and Julia Duin  
(Compl. Ex. 9)

## Matthew A. Kezhaya

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**From:** Lucien Greaves <lucien@thesatanictemple.com>  
**Sent:** Friday, October 29, 2021 07:02 PM  
**To:** Julia Duin  
**Subject:** Re: some questions

Hello Julia,

Is there a reason that you insisted on disclosing only my legal name, but allowed the detractors to remain pseudonymous when I explicitly stated of preference for keeping to the pseudonym? I'm particularly concerned, though, that you included claims of sexual abuse cover up? What claims? Covered up how? By whom? "More than anecdotal" in what way? In that there is some corroborated evidence? Did you seek any type of verification whatsoever? It is apparent that you merely sought out people saying negative things about TST and ran with whatever narrative you felt you could get away with, after having abandoned the senseless inquiry into corporate structure following my having pointed out to you that there wasn't even a theory of malfeasance. Why did you not ask about the other claims? Were you concerned that I might debunk those, too? This claim about TST leaders in pictures with alt right leaders. I am unaware of these pictures. Did you see them? Where may I find them? Who exactly is in them? Did you bother to try to reach out to any congregation membership to ask them about their experiences in their local TST community? Did you think to ask any of them if they were ever asked not to speak to ex members, or if on the national level we asked anything of them at all outside our Code Of Conduct? How is it that you could include claims of financial fraud without mentioning the various times that it was explained to you that we don't have a buy in, dues, or tithing? "Fraud" in what way? You stain us with the label of "fraud," but again without a tangible claim. What is meant by fraud? Do you know? Do you care? Are we accused of not putting our campaign fundraisers toward our projects, which we have, provably, followed through on? Who is getting ripped off and how? You stated allegations against us clearly for no other purpose than to cause reputational harm, and you did nothing to even attempt to make sense of the claims. Did you ask to speak to any of the alleged victims of sexual abuse? If so, why didn't you speak to them? If not, why not? If no actual victims were offered for you to contact, did you not maybe think there was something strange about the claim? Do you simply publish extreme allegations like that with absolutely no attempt to measure credibility? Do you imagine that you've acted appropriately in your capacity as a journalist? After abandoning the corporate structure inquiry and learning of the lack of financial burden, did it not occur to you that you were speaking to sources that were not credible? In 10 years, I have seldom encountered such biased hack work as this. This is a disgrace.

----- Original message -----

From: Lucien Greaves <lucien@thesatanictemple.com>  
Date: 10/29/21 5:44 PM (GMT-05:00)  
To: Julia Duin <j.duin@newsweek.com>  
Subject: Re: some questions

This is all a straight up lie. We've never told anybody not to speak to former members and we have very explicit rules against doxxing. Did she provide you emails? Anything to substantiate her claims? Did you even do the work of trying to determine if she was, in fact, a member of TST at all?

Salome DeMeur, a pseudonym for a former member based in Pensacola, Fla., said she got sidelined after asking Greaves why "he was going to sue Twitter like

it was personal vendetta, but then using TST money to do so." Once she became known as a dissenter, she said, members of TST's national council threatened to out her to the Marine Corps, her employer, despite the Corps already being aware of DeMeur's religious activities.

"After leaving, it was basically Scientology-lite," she told *Newsweek* in an email. "People were told not to talk to us. Members were trying to break up my relationship with my boyfriend. Several people were legally threatened. I know quite a few people who have refused to speak out at all because they fear legal action from TST. A few of us have been in mental health treatment since."

----- Original message -----

From: Julia Duin <j.duin@newsweek.com>  
Date: 10/29/21 5:18 PM (GMT-05:00)  
To: Lucien Greaves <lucien@thesatanictemple.com>  
Subject: Re: some questions

Thanks for getting back to me so quickly. The complainant felt just allowing these activities was opening up TST to liability; that instead of guidelines, there should be no-go areas. It wasn't that he thought guidelines were too restrictive. Anyway, the piece is out: <https://www.newsweek.com/orgies-harassment-fraud-satanic-temple-rocked-accusations-lawsuit-1644042>

On Fri, Oct 29, 2021 at 10:39 AM Lucien Greaves <[lucien@thesatanictemple.com](mailto:lucien@thesatanictemple.com)> wrote:

Nobody mocked him for bringing it up. He was told that the guidelines weren't encouragement toward anything, nor did anybody have to be involved in such things. Such guidelines are the product of the fact that TST tries to allow the maximum autonomy for congregations while making sure that restrictions are imposed by necessity to make sure that everybody is reasonably safe and comfortable. Sex positivity guidelines are a merely a matter of placing the least amount of restriction while accounting for those concerns. If I remember correctly, he had no real complaint about any actual events that occurred. He simply did not like that there were guidelines for such things at all.

----- Original message -----

From: Julia Duin <[j.duin@newsweek.com](mailto:j.duin@newsweek.com)>  
Date: 10/29/21 1:27 PM (GMT-05:00)  
To: Lucien Greaves <[lucien@thesatanictemple.com](mailto:lucien@thesatanictemple.com)>  
Subject: Re: some questions

Thanks for the correction - your voice mail is full btw! Re the complaint, it was filed in February 2020 by a "Scott Malphas" out of the Arizona chapter. He took it to the IC (International Council?) whose members, he said, mainly mocked him for bringing it up.

On Fri, Oct 29, 2021 at 9:58 AM Lucien Greaves <[lucien@thesatanictemple.com](mailto:lucien@thesatanictemple.com)> wrote:

Sorry. Twice my phone placed "of" in my reply where I meant "if"

----- Original message -----

From: Lucien Greaves <[lucien@thesatanictemple.com](mailto:lucien@thesatanictemple.com)>  
Date: 10/29/21 12:50 PM (GMT-05:00)  
To: Julia Duin <[j.duin@newsweek.com](mailto:j.duin@newsweek.com)>  
Subject: Re: some questions

Again, I would ask if there's an actual complaint here. Did the alleged former member actually witness anything of the type? What was the complaint? That there were guidelines at all? That the member simply didn't like the idea of such activities taking place? No events are compulsory to continued membership within TST. Some members are sex workers, others are in fetish scenes, etc. The guidelines are merely meant to set parameters in which of these things are incorporated into any TST events, they are done in a way that is safe, sane, and consensual, and that nobody feels uncomfortable or coerced. The document does not ask that such events must take place, but sets limits on such behavior, of engaged in. I really don't know what this alleged complaint is.

----- Original message -----

From: Julia Duin <[j.duin@newsweek.com](mailto:j.duin@newsweek.com)>

Date: 10/29/21 12:32 PM (GMT-05:00)

To: Lucien Greaves <[lucien@thesatanictemple.com](mailto:lucien@thesatanictemple.com)>

Subject: Re: some questions

Hey Lucien - one more question (hopefully) - a former member brought to my attention a memo of "sex positive" guidelines for TST gatherings that suggests, among other things "orgies, BDSM, fetish balls...ritual flogging, live ritual sex, burlesque show..." as legit activities. How often does this go on? The member said he filed a complaint about such activities but never got much of a response. Can you comment?

On Thu, Oct 28, 2021 at 1:18 PM Lucien Greaves <[lucien@thesatanictemple.com](mailto:lucien@thesatanictemple.com)> wrote:

Hello Julia,

I have cced Malcolm, as he has membership numbers and budgeting information. We're at over 500k now, but again, membership is free. There are no dues.

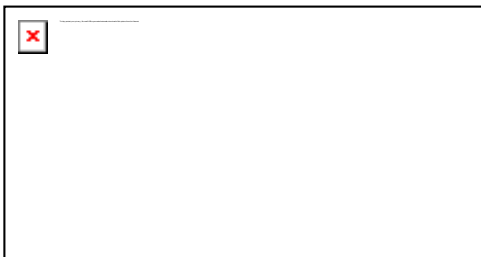
We rolled out our ordination program in 2020. Here is a link that might be helpful: <https://ordained.satanicministry.com/pages/about>

Yes, in 2019 we were recognized as a Church by the IRS which gave us cause to create TST, inc.

I would say that the claims that there is something nefarious about our corporate structure is a conspiracy theory, but I don't think it even rises to that level, because as far as I can see there is no theory; only some complaints that it is confusing. I have yet to understand how it is we are supposed to be inappropriately benefiting from this corporate structure, or, if one considers our history and the evolution of the organization, how it is that we should be structured differently? I would hope that before anybody suggests that there is something wrong, they would have a clear, well-defined claim of what exactly is wrong, as well as a vision of what is right. If there actually is a theory here, if there is some type of tangible suspicion of wrong-doing, I could better direct you to whomever might be able to address it -- whether that be a lawyer who helped set it up, and accountant, or whatever best helps to address the issue.

I won't object to whatever you use age-wise. I'm not trying to be difficult, I just have never participated in a profile piece!

Thank you



## About Satanic Ordination | The Satanic Temple Ministry

Become an ordained priest with The Satanic Temple. The Satanic Temple launched the Satanic Ordination program in 2020 as a way to recognize qualified members who have demonstrated a deep and passionate

understanding of the beliefs, values and goals of our church and a connection to our community.

[ordained.satanicministry.com](http://ordained.satanicministry.com)

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**From:** Julia Duin <[j.duin@newsweek.com](mailto:j.duin@newsweek.com)>  
**Sent:** Thursday, October 28, 2021 3:58 PM  
**To:** Lucien Greaves <[lucien@thesatanictemple.com](mailto:lucien@thesatanictemple.com)>  
**Subject:** Re: some questions

Hi again - folks are asking about exact membership figures. You told me your mailing list went from 300,000 to close to 500,000. Does the latter constitute your membership figures? If not, how many members do you have?

Julia

On Thu, Oct 28, 2021 at 12:37 AM Julia Duin <[j.duin@newsweek.com](mailto:j.duin@newsweek.com)> wrote:

I thought that was the year TST became a 501c3. Am I correct?

Also, I see you didn't deny you're 45 years old or that the Seattle Times was right or wrong, so I'll use that as your age, OK?

And...I'd asked about an annual budget for the LLC and TST. Did you get those figures?

Took your suggestion to engage Joseph Laycock, which was most helpful.

Exactly when did TST change to this ministry set-up?

Hopefully, those are all my questions!

Julia

On Tue, Oct 26, 2021 at 12:59 PM Lucien Greaves <[lucien@thesatanictemple.com](mailto:lucien@thesatanictemple.com)> wrote:

Hello Julia --

I would say that at the time, the idea of Satanists being around was something that people had a lot of hesitation towards because people were far less aware of who we are and what we stand for, so I would change "likes" to a past tense of "liked." Today, there are people who want us around as a reassurance that religious liberty is being respected by viewpoint-neutral office-holders.

There were 2 Medium pieces written by the same member. The second one deals more directly with the question of what happened with the Seattle chapter:

<https://medium.com/@viceovervirtue666/that-which-can-be-destroyed-by-the-truth-should-never-be-spared-its-demise-814b882e4454>

<https://medium.com/@viceovervirtue666/part-iii-is-tst-an-abusive-mind-controlling-cult-that-limits-its-members-ability-to-speak-while-9c8280108d04>

Also, it occurs to me that I shouldn't assume you know anything that we didn't discuss, so I'll mention that there is a documentary about us that premiered at Sundance a few years ago, now streaming on Hulu. It's called "Hail Satan?" and it was made by a neutral director who knew of the controversy in 2018 and the chapters that left, but she did not feel that that particular subplot was meaningful to the overall story.

There is also a book about us published by Oxford University Press (peer reviewed publication process) called "Speak of the Devil" by a Texas professor of religions, Joseph Laycock. He did, in fact, talk about the events of 2018 and some of the criticisms that we supposedly harbor secret alt-right sympathies, but after years of actual research, he saw no credibility in that point of view. Prof Laycock might also be of interest for you to speak to

because he is an unbiased source (a Catholic, even) who would probably be willing to tell you about the campaign of harassment that the Seattle people who you are writing about launched against him which compelled him to block them on social media.

[joe.laycock@gmail.com](mailto:joe.laycock@gmail.com)

There are many other people that they harass incessantly while trying to paint our defense of our Intellectual Property as a "SLAPP suit" (which it objectively isn't), but those that I can think of are members of TST, and so probably can't be considered unbiased for your purposes.

Membership comes and membership goes. Some that go say rotten things about us. The lawsuit in Seattle is about defending our Intellectual Property, which is a duty we have to our congregations and membership, so that they may know that we, as an organization, will not allow our community to be publicly misrepresented in our own name. Who could feel comfortable identifying with us were we to do anything less?

The fact of the matter is, though, they have reached out to a large number of journalists, Podcasters, and any influential person who they think might be willing to believe their story of victimization at the hands of TST, and upon investigation, none of them found them credible, and for good reason.

As I may have mentioned yesterday, they claim we are a "pyramid scheme" and that we're running some type of financial scam. We willingly pitch ourselves into litigation where questions of our intent bring scrutiny upon our corporate structure and finances, and we've survived such scrutiny with ease. I think that a good question for them would be, "how much money did you lose and how? When were you ever required to pay money for anything at all?" There is nothing on our end that ever required their financial buy-in.

This might be deeper than your piece is meant to go, but Modern Satanism as defined by Anton LaVey was premised on a de-racialized Social Darwinist philosophy that made sense to me decades ago. By the time that we founded The Satanic Temple, however, I had broken with that philosophy entirely, and had come to believe it erroneous. TST was founded on principles that explicitly broke with LaVeyan philosophy and advocates for altruism and compassion. That evolution of thought was never concealed, and was openly a part of TST as the beginning of a Satanic Reformation. Now, however, people like the conspiracy theorists who decry us in Seattle take comments of mine from 20 years ago and attempt to make people believe that they are leaked insights into my current, yet publicly hidden, state of mind. Here is an essay I wrote regarding the differences between The Satanic Temple and the Church of Satan, and my previous point of view could be categorized as the liberal assimilation of LaVeyanism that I describe in the essay. I was never sympathetic to racist or Nazi thought.

<https://thesatanictemple.com/pages/what-is-the-difference-between-the-satanic-temple-and-the-church-of-satan>

When you ask what happened in 2019, to what are you referring?

Thank you

----- Original message -----

From: Julia Duin <[j.duin@newsweek.com](mailto:j.duin@newsweek.com)>

Date: 10/26/21 2:56 PM (GMT-05:00)

To: [lucien@thesatanictemple.com](mailto:lucien@thesatanictemple.com)

Subject: some questions

Dear Lucien:

Thanks for yesterday's interview and just a reminder for you to send me that Medium link. Got a message from Matthew, your lawyer, so I'm trying to reconnect with him.

A few things: The Seattle Times mentioned you in a piece this year, saying you're 45 years old. Is that accurate?

Also, did I get this quote correct while asking you about the switch to an LLC? **"No one likes to have Satanists around,** so we hoped to have a more neutral entity name to work across denominations," said Greaves. "We wanted a central brand name to fall back on to be more inclusive and not as abrasive as the Satanic Temple."

Also, was TST founded in 2012 or 2013? The LLC was founded in 2014...so what happened in 2019?

Sincerely,

--

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Julia Duin | Contributing editor/religion

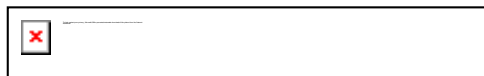
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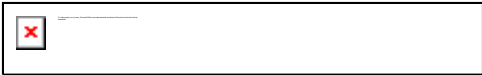
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